



# Klamath River Basin Fisheries Task Force

*Working to Restore Anadromous Fish in the Klamath River Basin*

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California Commercial  
Salmon Fishing Industry

California Department  
of Fish and Game

California In-River Sport  
Fishing Community

Del Norte County

Hoopa Valley Tribe

Humboldt County

Karuk Tribe

Klamath County

Klamath Tribes

National Marine Fisheries Service

Oregon Department  
of Fish and Wildlife

Siskiyou County

Trinity County

U.S. Department of Agriculture

U.S. Department of the Interior

Yurok Tribe

Honorable Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

APR 23 2004

Subject: PacifiCorp Klamath River Hydroelectric Project FERC-2082

Dear Ms. Salas:

This letter is to provide comments from the Klamath River Basin Fisheries Task Force (Task Force) on PacifiCorp's Final License Application (FLA) for the FERC-2082 Klamath River Hydroelectric Project (Project). The Task Force previously provided a letter of comment to PacifiCorp on this project on March 21, 2001.

The Task Force was established by the Klamath River Basin Fishery Resources Restoration Act of 1986 (P.L. 99-552) (Klamath Act) to provide recommendations to the Secretary of the Interior on the formulation, establishment, and implementation of a 20-year program to restore the anadromous fisheries of the Klamath River Basin Conservation Area (designated as the anadromous fish habitats and resources of the Klamath River basin). We are an active Federal Advisory Committee with broad representation of interests affected by the status of anadromous fisheries of the Klamath River Basin. All actions taken by the Task Force are done by consensus only. For more information on the Task Force, please see the enclosed brochure. In 1991, the Task Force completed a long range plan to meet the goal of restoring the anadromous fisheries of the Klamath River Basin (including both the upper and lower portions of the basin, and excluding the Trinity River Basin). This plan has been submitted and the Federal Energy Regulatory Commission has accepted it as a comprehensive plan in this licensing process.

Task Force comments on the Project FLA are as follows:

The Task Force believes that the Final License Application is incomplete in most respects. The fisheries resources of the Klamath River have undergone a major decline during the past century. This decline has led to the listing of coho salmon under the Federal and California Endangered Species Acts, as

well as the curtailment of fisheries along the Pacific Coast from the Columbia River to south of San Francisco to protect Klamath Basin origin Chinook. Among the factors that have contributed to the decline of the anadromous fisheries resources of the Klamath River is the construction and continued operation of PacifiCorp's Klamath River Hydroelectric Project<sup>1</sup>.

The Project was constructed beginning in 1918, with no anadromous fish passage facilities, even though primary spring Chinook spawning and rearing grounds existed above the dams, as well as considerable habitat for other anadromous fish populations. The Task Force notes that the current FLA contains no provisions for anadromous fish passage. The Task Force believes that provision for anadromous fish passage should be included within the final license, and that a range of fish passage options should be sufficiently examined in an EIS. This is in accordance with the recommendations of the National Research Council's recent report<sup>2</sup> regarding the Klamath Basin which recommended studies on the removal of Iron Gate Dam.

The Task Force is extremely concerned that PacifiCorp appears to have determined that fish re-introduction to the upper basin is not feasible at this time based on computer model runs that PacifiCorp has acknowledged are not complete, and that only include habitat within the Hydroelectric Project area itself<sup>3</sup>. The Task Force believes that it is up to the appropriate State and Federal Agencies to determine the effectiveness of reintroduction of anadromous fish to the upper Klamath Basin, and it is PacifiCorp's obligation to provide passage to facilitate the re-introduction if required by the agencies under their respective conditioning authorities. PacifiCorp appears to have pre-determined that fish passage is not warranted or feasible.

The Task Force is concerned that PacifiCorp has never mitigated for the loss of salmon, steelhead, or other anadromous species from the Klamath River upstream from its Copco facilities<sup>4</sup>. Elimination of these stocks without mitigation has reduced the abundance of populations, and continues to hinder restoration of those populations. Because of this, the Task Force believes that PacifiCorp needs to sufficiently examine the relative costs and benefits of a variety of fish passage options.

Hatchery operations are also a concern for the Task Force. We note that PacifiCorp has proposed to increase the proportion of coded wire tag marking of juvenile fall-run Chinook salmon from its current level to a constant fractional marking rate of 25%. We believe that this is a step in the right direction that will assist with management of harvest of Klamath River fisheries. We commend PacifiCorp for making this proposed change in hatchery operations.

However, several other aspects of hatchery management as proposed under PacifiCorp's FLA cause us great concern. For example, spring Chinook salmon, which inhabited the Klamath River below Copco before the construction of Iron Gate Dam in 1961, have disappeared from this portion of the river; yet no mitigation, hatchery or otherwise, is proposed. Likewise,

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<sup>1</sup> *Klamath River Basin Fisheries Task Force Long-Range Plan*, 1991. *Endangered and Threatened Fishes of the Klamath River Basin; Causes of the Decline and Strategies for Recovery*, NRC Press, October 2003.

<sup>2</sup> *Endangered and Threatened Fishes of the Klamath River Basin; Causes of the Decline and Strategies for Recovery*, NRC Press, October 2003.

<sup>3</sup> Apparently, no consideration was given in the model runs presented in the FLA to the large amounts of habitat that would be available above Upper Klamath Lake.

<sup>4</sup> Iron Gate Hatchery's stated mitigation purpose is for lost habitat between Iron Gate Dam and the Copco complex.

mitigation for steelhead has been a failure. Steelhead returns to Iron Gate Hatchery have dwindled since the hatchery program began in the early 1960s. This species is an important component of West Coast ecosystems, and of utmost importance to the states and tribes. Because PacifiCorp has determined that hatchery mitigation for steelhead is not “feasible” (in their judgment), fish passage should be vigorously pursued as a mitigation or enhancement option for this species.

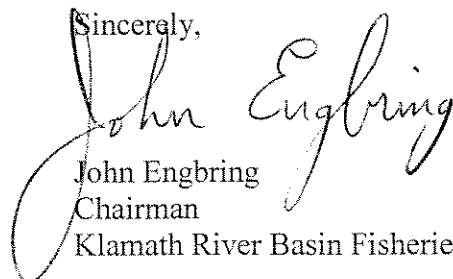
The potential effects of different hatchery management options on wild stocks need careful study. Options such as fall Chinook yearling versus smolt rearing, hatchery release coordination with managed flows and wild stock needs, and impacts of existing stocking rates should be studied and implementation adjustments proposed.

The FLA contains very little information on historical, current, or future impacts to anadromous fish stocks. PacifiCorp has performed certain analyses regarding water quality, geomorphology, fish disease, and other studies that extend downstream, but has not related these to historical, current, or future impacts to anadromous fish. For example, water quality analyses performed by PacifiCorp indicate that water temperatures during the migration and spawning period for fall Chinook salmon are generally warmer on average than pre-project conditions<sup>5</sup>. However, the implications of this significant impact to adult salmon survival, egg viability, and run timing are not addressed. This oversight must be corrected by PacifiCorp so that reasonable protection, mitigation and enhancement measures (PM&E's) can be devised. Similar analyses for other impacts to anadromous fisheries stocks in other resource areas, such as geomorphological effects and effects of peaking and minimum flows, are also lacking.

There is substantial information missing from the FLA to ascertain impacts to anadromous fisheries, and PacifiCorp has not provided enough information to devise reasonable PM&Es. The Task Force urges FERC to ask for and obtain this information.

The Task Force urges the FERC to consider the importance of the Klamath River Basin fisheries resource to coastal communities along the Pacific Coast as well as to the Klamath River communities, and to ensure that the health of these resources is addressed in any future licenses for the Klamath River Basin.

If you have any questions concerning this letter, please contact Phil Detrich, Executive Secretary of the Task Force, Yreka Fish and Wildlife Office.

Sincerely,  
  
John Engbring  
Chairman  
Klamath River Basin Fisheries Task Force

Enclosure (1)

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<sup>5</sup> Figure 4.8-57, *Water Resources Final Technical Report*, PacifiCorp, February 2004